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Chairman Ajit Pai  
Federal Communications Commission (FCC)  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

August 26, 2019

Re: Response to Notice of Proposed Rulemaking on Universal Service Contribution Methodology (WC Docket No. 06-122)

Dear Chairman Pai,

The Connecticut Association of School Business Officials (CASBO) is a non-profit professional association that represents school business officials throughout the State of Connecticut. School business officials work closely with school boards, administrators, staff, public officials and communities; and we are responsible for most aspects of school business and operations, including overseeing facilities, infrastructure, telecommunications and grounds.

We are writing today in response to the above-named proposed rulemaking which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Any changes to the E-Rate program should be focused on expanding its successful program, which has not yet reached its full potential. Any changes to this program must be focused on expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program, without considering its initial purpose, is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

CASBO is also concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools and rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

For the reasons stated above, we strongly urge the FCC to withdraw this proposal.

Thank you for the opportunity to respond to this important matter.

Sincerely,

David G. Lenihan  
Director of Government Affairs  
CASBO  
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